



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY RCRA COMPLIANCE SECTION

P.O. BOX 47600 • Olympia, Washington 98504-7600 • (206) 459-6000

September 2, 1993

Mr. Harry Twomey  
Puget Sound Air Pollution Control Agency  
110 Union Street  
Seattle, Washington 98101

RE: Burlington Environmental's Pier 91 Facility

Dear Mr. Twomey:

During a comment period earlier this year, Ecology received two letters that described concerns about odors associated with activities on land Burlington Environmental leases from the Port of Seattle. A third letter expressed concerns about air contamination. The rules under which Ecology is issuing a dangerous waste management facility permit to Burlington do not address odors or air emissions from the facility. Therefore, I am passing copies of the comment letters along to you.

The comment period resulted from an appeal of the dangerous waste permit Ecology issued for the Burlington Environmental Pier 91 facility in July 1992. Before the effective date of the permit, Burlington appealed nine requirements. Ecology held both a written comment period and, in response to requests, a public hearing on the appeal. Ecology expects to resolve the issues of the appeal this month.

When I spoke with you in August, you mentioned an interest in talking with Ecology inspectors for the facility. Joshua Chaitin, at 649-7216, is the dangerous waste inspector assigned to the site; he works out of Ecology's Northwest Regional Office. Sylvia Burges, at 553-1254, is the U.S. EPA contact; she is in Region 10's RCRA Compliance Section. Ms. Burges said you are welcome to look at EPA's files for the facility. Dave Croxton, at 553-2867, is another U.S. EPA contact; he is in Region 10's RCRA Permitting Section. Dave is responsible for reviewing the air emissions information required for U.S. EPA's hazardous waste permit to be issued soon.

When we talked, you also mentioned you would like information on which tanks on the site were being used by PANOCO and which by Burlington. Therefore, I am

RCRA PERMIT

ADMINISTRATIVE RECORD

ITEM NUMBER

TOTAL NUMBER OF PAGES

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Mr. Twomey  
September 2, 1993  
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also enclosing a copy of a site diagram providing this information. The figure was provided with comments the Port of Seattle submitted related to corrective action activities at the site. I have added a note to the diagram providing some updated information.

If you have any questions, or would like a copy of the responsiveness summary when it is available, please contact me at (206) 438-7413, or Gerald Lenssen, at (206) 438-7412.

Sincerely,



Janet R. Rhodes  
Hazardous Waste Permits

JR:jrr

Enclosures

cc: Sylvia Burges, U.S. EPA Region 10, MS HW104  
Dave Croxton, U.S. EPA Region 10, MS HW106  
Joshua Chaitin, Northwest Regional Office  
Gerald Lenssen, Hazardous Waste Permits

LIVE

JAN 19 '93

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ECOLGY

**The Reads**

1512 Magnolia Way West  
Seattle, Washington 98199

Hazardous Waste Permits  
Attention: Douglas Brown  
Department of Ecology  
Post Office Box 47600  
Olympia, Washington 98504-7600

January 14, 1993

Dear Sir:

Thank you for the well-organized, highly informative January 13 meeting at the Magnolia Community Center -- this, regarding local waste management. In attending, I represented my husband and me as property and home owners along the Magnolia Bluff.

Having recently completed several renovations, permits required (commercial and personal), we feel concern that private parties not be burdened by unwieldy or unnecessary requirements that bureaucratic systems are prone to impose. Certainly, it is not our intent to hinder any reputable and careful private enterprise; however, we are very much in favor of reasonable, suitably restrictive requirements intended to protect our residential neighborhood and local food and retail establishments.

It seems logical to conclude that waste facilities do not belong in residential neighborhoods in the first place. Contaminated air poses an unwelcome health hazard to virtually thousands. For these reasons, and more, we are in favor of informed and appropriately firm restrictions. Unless the granting of exemptions presents no measurable nuisance or safety hazard to nearby home owners and businesses, the same should **not** be conferred.

Thank you.

Sincerely yours,

*Debra R. Read*

Debra R. Read  
(206) 282-6820



January 13, 1993

Department of Ecology  
Hazardous Waste Permits Section  
4224-6th Ave  
Rowe six Bldg.4  
Lacey, WA98503

Re: Burlington Environmental's  
request for RCRA Part B Permit

Dear Sir:

To severely condition this permit will not be in my community's best interest, and Burlington's continued use of Pier 91 facilities will continue to threaten our health from their "biproductions". The liability from ground water cleanup is "joint and several" and that everyone connected to the property is "potentially liable". Our taxpaying community cannot afford another mistake by the Port's property management.

The F word here refers to Magnolia's "front" door. Every resident continues to monitor the repulsive odor from Burlington's process of waste management. PS Air Pollution Control Agency has lacked the ability to stop it. The Health Department has not informed the public about the increased rates of cancer from inhaling PACs, and the lung cancer rates in the Interbay Corridor.

Is the purpose of granting the final permit for the facility to finance cleanup? I do not question Burlington Environmental's intent to ensure a cleaner environment through responsible waste reduction, recycling, and profit - just their location (the heart of perhaps, the fastest growing two mile radius in Seattle). Chemical processing is the most dangerous industrial use of property, and should not have been zoned between Magnolia and Queen Anne. Burlington's effluent from hazardous waste "cleanup" is discharged to Metro's West Point, and Magnolia's shoreline. The 1991 mean total of polynuclear aromatic hydrocarbon concentrations (ug/g dry weight) in bivalves at Magnolia's four mile shoreline is 7.304 (highest in the country) as compared to the 1990 mean 5.507. I doubt a major oil spill could have a more severe impact. Last month's sampling may be "masked" by the Marina, another cumulative impact. The public may not understand that fish studies are indicators, and predictors for human health effects from exposure, not just from ingestion.

The Port declared "war" on our community with the grain terminal, and then the short fill, and now ~~sub~~leasing to Burlington Environmental and Panoco for the Port's convenience. They should provide a safer location, with less public liability, and neighborhood health threat. Litigation lines the wrong pockets.

Sincerely,

*Bonnie Orme*

Bonnie Orme 1949 Perkins Ln. W. Sea. WA 98199 (285-6521)

Jan. 18, 1993

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ECOLOGY

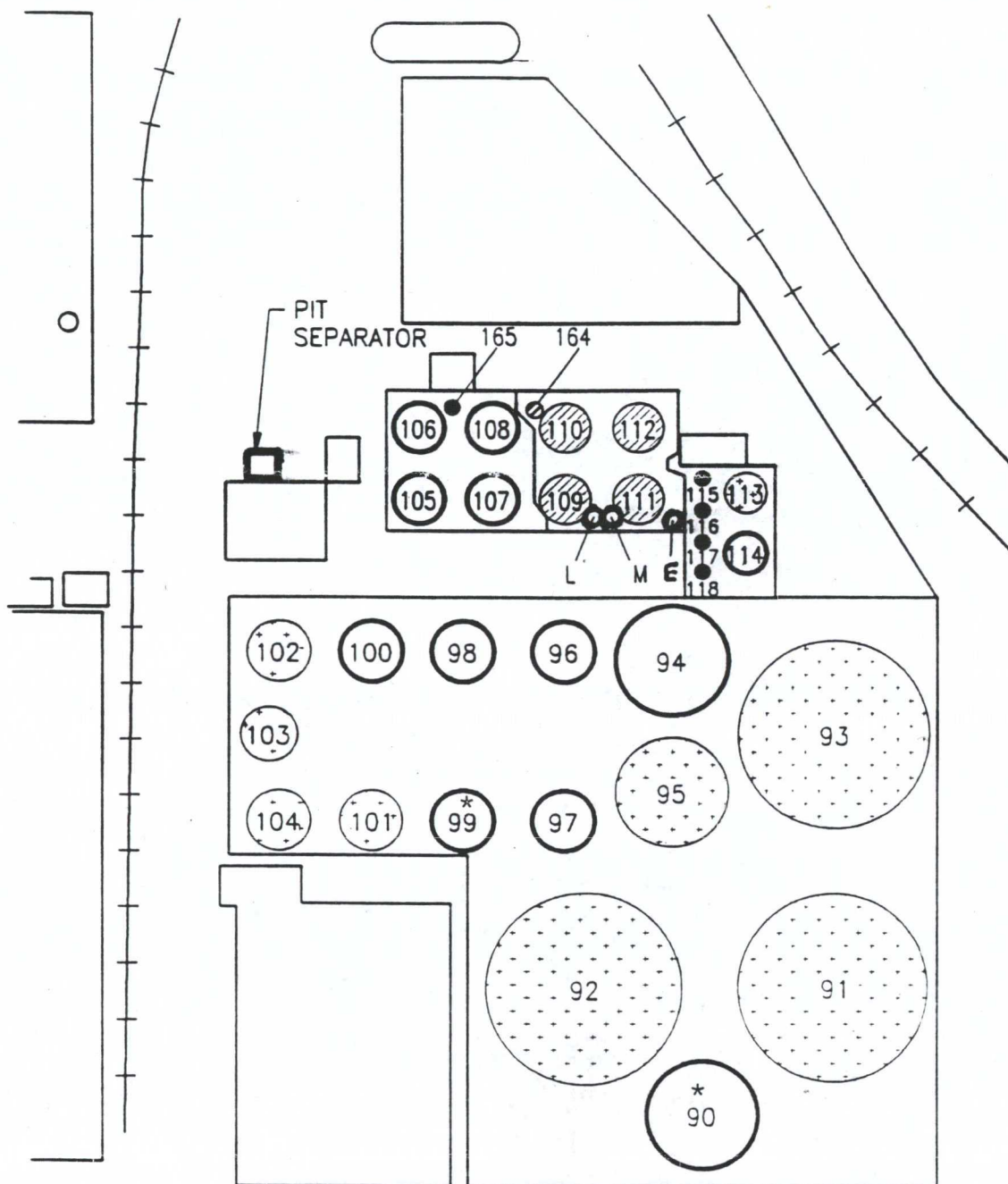
Douglas Brown  
Dept. of Ecology  
P.O. Box 47000  
Olympia, WA

Dear Sir:

We live just above pier  
91, and when the wind is  
right the stench from  
the "Waste management Co."  
is more than we can bear.  
I hate to think what it  
does to our lungs. Any  
rules you can make to  
protect us will be helpful.  
If we could get rid of  
the whole thing it would  
be best!

Thank you,  
Carolyn and Scott  
Fowler  
1820 Amherst Pl. W.  
magnolia





Note added by Ecology on September 1, 1993:

Tanks have been decontaminated, but not certified by an independent engineer. PANOCO leased tank 99 in 1990 and tank 90 in 1991.

### LEGEND

- CURRENTLY IN SERVICE AS D.W. TANKS
- DECONTAMINATED AND NO LONGER IN D.W. SERVICE
- REPORTEDLY SUBLEASED TO PANOCO SINCE 1974
- NOT IN SERVICE (EMPTIED IN 1989; REQUIRES DECONTAMINATION).

**Kennedy/Jenks Consultants**

PORT OF SEATTLE  
SEATTLE, WASHINGTON

**BURLINGTON ENVIRONMENTAL  
PIER 91 FACILITY  
TANK LAYOUT**

916059.00/P2SK001

**FIGURE 1**